

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>EASTERN PROFIT CORPORATION</b>	)	
<b>LIMITED,</b>	)	
	)	
<b>Plaintiff/Counterclaim Defendant,</b>	)	
	)	<b>Case No. 18-cv-2185</b>
<b>v.</b>	)	
	)	
<b>STRATEGIC VISION US, LLC,</b>	)	
	)	
<b>Defendant/Counterclaim Plaintiff.</b>	)	

**DEFENDANT STRATEGIC VISION’S  
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Defendant Strategic Vision US, LLC (“Strategic Vision”) respectfully moves this Court for an Order granting summary judgment in its favor and against Plaintiff Eastern Profit Corporation (“Eastern”) on the following claims:

- Count I (Breach of Contract) of Eastern’s Second Amended Complaint (Dkt. No. 93),
- Count II (Fraudulent Misrepresentation) of Eastern’s Second Amended Complaint (Dkt. No. 93), and
- Count IV (Unjust Enrichment) of Eastern’s Second Amended Complaint (Dkt. No. 93).

The grounds for this motion are set forth in Strategic’s Memorandum of Law in Support of its Motion for Summary Judgment, contemporaneously filed herewith.

Dated March 16, 2020

Respectfully submitted,

GRAVES GARRETT LLC

s/ Edward D. Greim

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ATTORNEYS FOR

DEFENDANT/COUNTERCLAIM PLAINTIFF

**CERTIFICATE OF SERVICE**

This certifies that, on March 16, 2020, the foregoing was served on all counsel of record via the Court's Electronic Case Filing System.

s/ Edward D. Greim

Attorneys for Defendant/Counterclaim Plaintiff